

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY,	:	
	:	Case No. 1:23-cv-11195-SHS
Plaintiffs,	:	
	:	
-against-	:	
	:	
MICROSOFT CORPORATION, OPENAI,	:	
INC., OPENAI LP, OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPKO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, OPENAI	:	
HOLDINGS, LLC,	:	
	:	
Defendants.	:	
	:	
	X	

**DECLARATION OF ALLYSON R. BENNETT IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

I, Allyson R. Bennett, declare as follows:

1. I am a Partner at the law firm of Morrison & Foerster LLP.
2. I submit this declaration in support of the motion for my admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
4. Pursuant to Local Rule 1.3(c), I state:
 - a. I have never been convicted of a felony.
 - b. I have never been censured, suspended, disbarred or denied admission or readmission by any court; and
 - c. There are no disciplinary proceedings presently against me.
5. I respectfully request admission *pro hac vice* to appear as counsel in this matter for defendants OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 29, 2024



Allyson R. Bennett